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10 Attorneys for UTILITY TREE SERVICE, LLC

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 In re:

12 PG&E CORPORATION,

13 - and -

14 PACIFIC GAS AND ELECTRIC
15 COMPANY,

16 Debtors.

17 Affects PG&E Corporation
18 Affects Pacific Gas and Electric Company
19 X Affects both Debtors
* *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF GEOFFREY A.
HEATON IN SUPPORT OF UTILITY
TREE SERVICE, LLC'S RESPONSE
TO REORGANIZED DEBTORS'
TWENTY-EIGHTH OMNIBUS
OBJECTION TO CLAIMS (BOOKS
AND RECORDS CLAIMS)**

20 Date: January 27, 2021

21 Time: 10:00 a.m.

22 Place: (Telephonic Appearance Only)

450 Golden Gate Avenue
Courtroom 17, 16th Floor
San Francisco, CA 94102

23 Related Docket No. 9427

24
25 I, Geoffrey A. Heaton, declare:

26 1. I am an attorney at law duly licensed to practice before this Court, and am special
27 counsel in the law firm of Duane Morris LLP, counsel to creditor Utility Tree Service, LLC ("UTS").
28 The matters stated below are made and based upon my personal knowledge, except for those matters

1 stated upon information and belief, and as to those matters I believe them to be true. If called as a
2 witness, I could and would competently testify to the matters set forth below.

3 2. I submit this declaration in support of UTS's Response to Reorganized Debtors'
4 Twenty-Eighth Omnibus Objection to Claims (Books and Records Claims) ("Response"), filed
5 herewith.

6 3. On behalf of UTS, I have repeatedly attempted to obtain information from the Debtors
7 explaining why the Debtors believe that the Disputed Balance, as that term is defined in the Response,
8 should be disallowed.

9 4. At this writing, I have not received a substantive response from the Debtors.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct. Executed on December 17, 2020, at San Francisco, California.

12 _____
13 /s/ Geoffrey A. Heaton (206990)
14 GEOFFREY A. HEATON
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